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(SPACE BELOW FOR FILING STAMP ONLY)

**FILED**

JUL 26 2006

CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY DEPUTY CLERK

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA - FRESNO

11 LUIS AVILA ESPINOZA and GUADALUPE  
12 AVILA,

13 Plaintiff,

14 v.

15 JACKIE LADD, PCM EXPRESS, business  
16 form unknown; JOYCE COOK and AGNES  
17 SELLERS dba FARMLAND  
TRANSPORTATION, business form  
unknown, , and DOES 1 through 20 ,  
inclusive,

18 Defendants.

CASE NO. CV-F-05-0411 AWI LJO

**STIPULATION AND ORDER TO  
CONTINUE DISCOVERY DATES**

Action Filed: March 28, 2005  
Trial Date: February 5, 2007

19 The following Stipulation is entered into between Plaintiffs, LUIS AVILA  
20 ESPINOZA and GUADALUPE AVILA and Defendants JACKIE LADD, PCM EXPRESS, ;  
21 JOYCE COOK and AGNES SELLERS dba FARMLAND TRANSPORTATION. The parties to  
22 the above entitled action by and through their respective counsel of record hereby agree and stipulate  
23 as follows:

24 1. The Court issued a Scheduling Conference Order with the following  
25 deadlines:

26 (a) Initial Expert Witness Disclosure: August 1, 2006;

27 (b) Supplemental Expert Witness Disclosures: August 8, 2006;

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(c) Non-Expert Discovery Cut-off and Related Discovery Motions:  
August 11, 2006; and

(d) Expert Discovery and Related Discovery Motions: September 15, 2006.

The parties have been engaging in written discovery as well as depositions in this matter for several months. The completion of depositions necessary in the case has been delayed due to service of the third party percipient witnesses not being in the control of any of the parties to the case, and several residing in Mexico.

The parties have now scheduled a number of depositions for August and September of 2006. Because of the delay in completing non-expert depositions, the parties have agreed to continue the above cut-off dates as follows:

(a) Initial Expert Witness Disclosure: September 15, 2006;

(b) Supplemental Expert Witness Disclosures: September 22, 2006

(c) Non-Expert Discovery Cut-off and Related Discovery Motions:  
September 25, 2006; and

(d) Expert Discovery and Related Discovery Motions: October 20, 2006.

The parties respectfully request the Court to enter an amendment to the Scheduling Order consistent with the stipulation of the parties above.

Dated: July 21, 2006

WILKINS, DROLSHAGEN & CZESHINSKI LLP

By   
John A. Drolshagen  
Attorneys for Defendant Joyce Cook and Agnes  
Sellers, dba Farmland Transportation

Dated: July 18, 2006

LAURETI & SIDIROPOULOUS, A.P.C.

By   
Larry J. Sidiropoulos,  
Attorney for Plaintiffs

1 Dated: July 21, 2006

LIEDLE, GETTY & WILSON, LLP

2  
3 By   
4 Jacy Okamoto  
5 Attorneys for Defendants, Jackie Ladd and  
6 PCM Express

7 ORDER

8 The Court, having reviewed the Stipulation of the parties and finding good cause,  
9 hereby issues an order continued the following dates and deadlines as follows:

- 10 (a) Initial Expert Witness Disclosure: September 15, 2006;  
11 (b) Supplemental Expert Witness Disclosures: September 22, 2006  
12 (c) Non-Expert Discovery Cut-off and Related Discovery Motions:  
13 September 25, 2006; and  
14 (d) Expert Discovery and Related Discovery Motions: October 20, 2006.

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16 IT IS SO ORDERED:  
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19 Honorable, Lawrence J. O'Neill

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